

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

Twana Ahmed,	§	
	§	
<i>Plaintiff,</i>	§	No. 4:23-cv-02823
	§	
v.	§	Hon. Judge Lee H. Rosenthal
	§	
	§	
Universal Protection Service, LP, d/b/a	§	Jury Demanded
Allied Universal Security Services,	§	
	§	
<i>Defendant.</i>	§	
	§	

**PLAINTIFF TWANA AHMED’S PROPOSED TRIAL TIMING**

Pursuant to the Court’s directive, Plaintiff Twana Ahmed files his proposed trial hours for the jury trial scheduled to begin August 18, 2025. Defendant Allied Universal refused to participate in this filing as a joint proposed timing estimate, even with the parties’ separate positions outlined.

Allied today more than doubles its will-call witness list to total of 13. Just before noon today, Allied for the first time more than doubled the number of its *will call* trial witnesses. Its will-call list now totals 13 witnesses and includes 6 witnesses that do not overlap with Mr. Ahmed’s will-call list. *See* Defendant’s email and revised witness list attached as exhibit B. In short, its total will-call witnesses now exceed those estimated at docket call by more than double. This revelation today may require Mr. Ahmed to amend his will-call witness list. The total, non-duplicative will-call witnesses is not feasible in a 5 day trial.

Additional rationale for time estimate. Mr. Ahmed’s attorneys estimate that the trial will require up to 10 calendar days, which equates to 7 days of actual trial time and sets aside up to 3 days for

jury deliberation. They take seriously the Court's time and the jurors' time. They ask that the Court allow them to earn the Court's trust on not wasting time and streamlining the trial as much as is possible consistent with their fiduciary duties to their client. Bios are attached as exhibit A.

The estimated time is also consistent with the time required for a favorable verdict in the last two single-plaintiff jury trials that Amy Gibson and David Wiley tried. The cases were:

*Jackson v. Granbury SNF LLC et al.*, No. C2021152, Hood County District Court  
7 total trial days from jury selection through jury deliberation and verdict of \$8.5 million

*Carter v. City of Abilene*, Cause No. 10138D, Taylor County District Court  
8 total trial days from jury selection through jury deliberation and verdict over \$2.6 million

The proposed timing calculations are based on the Court's normal trial hours schedule currently listed in its procedures, which equates to an estimated 7 hour trial day beginning at 8:30 am and ending at 5:00 pm with breaks in the morning, afternoon, and at lunchtime.

The proposed timing calculation is also based on Allied's estimate today of its time at a little over 1½ days, which is about 12 hours.

**Hours estimate.** Plaintiff Twana Ahmed's proposed time for opening, direct, cross, and closing argument including rebuttal: 35 hours.

Respectfully submitted,

/s/ Amanda Hernandez

Ms. Amanda C. Hernandez

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*Attorneys for Twana Ahmed*

**CERTIFICATE OF SERVICE**

I certify that on May 21, 2025, I filed the foregoing *Proposed Trial Timing* via the Court's CM/ECF system, thereby effecting service on Defendant's attorneys of record.

/s/Amanda C. Hernandez  
Amanda C. Hernandez